HILL RIVKINS & HAYDEN

45 Broadway, Suite 1500, New York, NY 10006-3739 Tel: (21

Website: www.hilleivkinslaw.com

Fax: (212) 669-0698/0699

e-mail: thcfirm@hil

DO COMMENT PEECTRONICALLY FILED

USIDOSDNY

JUDGE ROBES

DATE FILED:

CHAMBLES OF

August 23, 2007

Fax Transmission - 212-805-7917

The Honorable Robert P. Patterson, Jr. United States District Judge United States District Court Southern District of New York 500 Pearl Street

New York, NY 10007

MEMO ENDORSED

Re: (2) Insurance Company of North America v. C.U. Transport Inc., China United Transport, Inc.,

> Kawasaki Kisen Kaisha Ltd., K-Line; M/V "EASLINE TIANJIN", etc.,

07 Civ. 959 (RPP)

(3) Reed & Barton Corporation v. M.V. Easline Tianjin, in rem and Yang Ming Marine Transport Corp. and Unifreight Forwarder Inc. 07 Civ. 1357 (RPP)

- (4) American Home Assurance Co. et al. v. Easline Tianjin, et al. 07 Civ. 2562 (RPP)
- (5) The Travelers v. M/V EASLINE TIANJIN 07 Civ. 3104 (RPP)
- (6) Klaussner International LLC v. MV. EASLINE TIANJIN, etc., et ano. 07 Civ. 3180 (RPP) Our File No.: 29356-JEO

Dear Judge Patterson:

We represent the plaintiffs in the actions referred to above as (3) and (6). We are writing on behalf of the other plaintiffs in actions (2), (4) and (5), and with the consent of

NEW JEISEY 175 North Broadway South Amboy, NJ 088"9-1638 Tel: (732) \$38-0300 Fix (732) 316-2365 e-mail: thefirm@hillri.kins.com

TEXAS 712 Main Street, Suite 1515 Houseon, TX 77002-3209 Tel: (713) 222-1515 Fax: (713) 222-1359 e-mail: hillrivkinstexas@billrivkins.com

CONNECTICUT 60 Quarry Dock Road Branford, CT 06405-4654 Tel: (203) 315-9274 Pare (203) 315-9264 e-mail: hillrivkinset@snet.net

CALIFORNIA Of Counsel: Brown & Associates 11140 Fair Oaks Boulevard, Suite 100 Fair Oaks, CA 95628-5126 Tcl: (916) 859-4910 Fax: (916) 859-4911

counsel for Yang Ming Transport Corporation and Yang Ming (America) Corporation ("Yang Ming") in all of the above actions, to request a two week extension until September 14, 2007 for all plaintiffs to file opposition papers to Yang Ming's Motions to Dismiss.

We make this application as counsel for all the parties referred to above are engaged in productive settlement discussions.

All counsel are awaiting instructions from clients here, and abroad. An additional two weeks would allow the parties the opportunity to ascertain if these matters can be amicably resolved.

Respectfully submitted,

HLL RIVKINS & HAYDEN LLP

John Eric Olson

JEO.ds

Fax Transmission <u>- 212-376-6488</u> cc:

Edward Radzik, Esq. McDermott & Radzik

<u>Fax Transmission - 212-344-7285</u>

Paul Keane, Esq. Cichanowicz Callan Keane Vengrow & Textor LLP

Fax Transmission - 212-732-7352

David L. Mazaroli Law Offices of David L. Mazaroli

Fax Transmission - 516-877-2230/2240

Roman Badiak, Esq. Badiak & Will LLP

29356\018JudgePatterson



